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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALJOSHUA RULLAN, an individual, and
CHERYL RULLAN, an individual,

Plaintiffs,

vs.

JONG MIN RHEE (aka JOHN LUSSO);
LUSSO AUTO, LLC, a Nevada limited
liability company, dba LUSSO AUTO SPA &
DESIGN and LUSSO AUTO DESIGN;
DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No.: 2:22-cv-00597-APG-BNW

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND TIME TO RESPOND TO
PLAINTIFFS' COMPLAINT (FIRST
REQUEST)**

Pursuant to Federal Rule of Civil Procedures and LR IA 6-1, the parties, by and through their undersigned counsel of record, hereby stipulate to extend the time for Defendants JONG MIN RHEE and LUSSO AUTO, LLC, ("Defendants") to respond to Plaintiffs' Complaint [ECF No. 1]. This is the first stipulation for extension to file Defendants' responsive pleadings to the Complaint.

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Defendant Lusso Auto, LLC's response to Plaintiffs' Complaint [ECF No. 1] was due to be filed May 3, 2022. On information and belief, Mr. Rhee mistakenly understood that correspondence regarding waiver of formal service would allow for additional time for both Lusso Auto, LLC and himself personally. Mr. Rhee was provided a letter dated April 27, 2022 [ECF No. 5] from Plaintiff's counsel explaining the wavier of service. Defendants were not aware of a missed deadline until the underlying counsel was retained for this matter. Therefore, excusable neglect exists pursuant to LR 1A 6-1(a) to allow for this deadline to be extended. *See also Declaration from Martin I Melendrez, Esq., attached as Exhibit A.* Further, Plaintiffs are agreeable to allow Lusso Auto, LLC and Mr. Rhee individually to respond to the Complaint as indicated by Plaintiffs withdrawal of their Motion for Entry of Default [ECF No. 9] and this Stipulation.

Defendant Jong Min Rhee's response to Plaintiffs' Complaint [ECF No. 1] is currently due June 27, 2022. Pursuant to agreement of the parties, by and through their undersigned counsel of record, both Defendants will file a responsive pleading no later than May 26, 2022. This is the first request for an extension of time to allow Defendants to respond to Plaintiffs' Complaint.

DATED this 25th day of May, 2022.

HAWKINS MELENDREZ, P.C.

/s/ Martin I. Melendrez
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DATED this 25th day of May, 2022.

MARQUIS AURBACH

/s/ Tye S. Hanseen
 TYE S. HANSEEN, ESQ.
 Nevada Bar No. 10365
 10001 Park Run Drive
 Las Vegas, Nevada 89145
Attorneys for Plaintiffs

IT IS SO ORDERED, that Defendants have through to and including May 26, 2022 to respond to Plaintiffs' Complaint (ECF No. 1)

DATED: May 26, 2022.


 UNITED STATES MAGISTRATE JUDGE